

# Fact Sheet



## For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-10700001-2013**  
Application Received: **November 13, 2012**  
Plant Identification Number: **03-54-10700001**  
Permittee: **E. I. du Pont de Nemours and Company**  
Facility Name: **Washington Works**  
Business Unit: **Central Maintenance Services (Part 14 of 14)**  
Mailing Address: **P.O. Box 1217, Parkersburg, WV 26102-1217**

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Physical Location:	Parkersburg, Wood County, West Virginia
UTM Coordinates:	442.368 km Easting • 4,346.679 km Northing • Zone 17
Directions:	From Charleston take Interstate 77 (I-77) to Exit 176. From the exit ramp, turn left on US Route 50 bypass and go towards the Athens Ohio Exit. Follow US Route 50 bypass to the DuPont Road, Route 892. This is the last exit before the bridge over the Ohio River. At the stop light at the bottom of the exit ramp, turn left. The plant will be easily visible on the right. The plant is about half mile from the exit ramp.

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### Facility Description

DuPont Washington Works is a multiple business, multiple product line facility that produces plastic resins and their associated feedstock materials. Central Maintenance Services is a segment of Washington Works that supports other operations on site by providing specific maintenance services to other business and product lines. Central Maintenance Services does not manufacture any product as defined by a SIC or NAICS code classification and thus uses the SIC code 2821 and NAICS Code 325211 for the entire facility. The maintenance facilities perform mechanical support activities that encompass, but are not restricted to, instrument calibration, relief valve repair, incidental painting, machining, assembly, disassembly, light sheet metal fabrication and repair, light carpentry for internal use, piping fabrication, welding, parts cleaning, and mechanical quality control functions.

## Emissions Summary

Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2012 Actual Emissions
Carbon Monoxide (CO)	0	0
Nitrogen Oxides (NO <sub>x</sub> )	0	0
Particulate Matter (PM <sub>2.5</sub> )	0	0
Particulate Matter (PM <sub>10</sub> )	4.07	0.071
Total Particulate Matter (TSP)	4.07	0.244
Sulfur Dioxide (SO <sub>2</sub> )	0	0
Volatile Organic Compounds (VOC)	19.37	0.495
<i>PM<sub>10</sub> is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions	2012 Actual Emissions
Toluene	0.052	0.0475
Ethylbenzene	0.18	0.0059
Xylene	0.82	0.0177
Naphthalene	0.5	0

*Some of the above HAPs may be counted as PM or VOCs.*

## Title V Program Applicability Basis

Due to the facility-wide potential to emit over 100 tons per year of criteria pollutants (CO, NO<sub>x</sub>, PM<sub>10</sub>, SO<sub>2</sub>, and VOC), over 10 tons per year of a single Hazardous Air Pollutant (HAP), and over 25 tons per year of aggregated Hazardous Air Pollutants (HAPs), DuPont Washington Works is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate matter and opacity limits for manufacturing sources
	45CSR11	Standby plans for emergency episodes.
	45CSR21, Section 30	Solvent Metal Cleaning.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.

	45CSR34	Hazardous Air Pollutants Pursuant to 40 C.F.R. Part 63
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart JJ	National Emission Standards for Wood Furniture Manufacturing Operations
	40 C.F.R. Part 63 Subpart GGGGG	National Emission Standards for Hazardous Air Pollutants: Site Remediation
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

### Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
None		

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### Determinations and Justifications

The following changes were made to the permit during this renewal:

DuPont Washington Works submitted PD12-050 on April 26, 2012 for addition of two Safety-Kleen parts cleaners in the central maintenance shops. The changes associated with PD12-050 are discussed below:

- Two Parts Cleaners (Emission Unit IDs-M1/1B15C1, M1/1B15C2) have been added to the Emission Unit Table.
- Requirements for the Parts Cleaners are added in section 5.0 of this permit.

Since DuPont Washington Works has not operated the Carpenter shop for a number of years, section 5 has been deleted. Since 40 CFR 63 Subpart JJ requirements apply to the entire site, those requirements were moved to section 3.0 - Facility-wide Requirements as discusses below:

- Condition 5.1.1 has been moved to Section 3.1 as condition 3.1.11.
- Condition 5.4.1 has been moved to Section 3.4.7. This relocates the recordkeeping requirement to show compliance with the 100 gallons per month limit for finishing material and adhesives.

**Non-Applicability Determinations**

The following requirements have been determined not to be applicable to the subject facility due to the following:

<b>40 C.F.R. 63 Subpart MMMM</b>	“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products.” The surface coating activities of Central Maintenance Services are excluded from the requirements of the rule because they are conducted as part of janitorial, building, and facility maintenance operations and the coatings used are supplied by non-refillable aerosol containers.
<b>40 C.F.R. 63 Subpart RRRR</b>	“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Furniture.” The surface coating activities of Central Maintenance Services use non-refillable aerosol containers for the purpose of repairing furniture for on-site use and are excluded from the requirements of the rule.
<b>40 C.F.R. 63 Subpart QQQQ</b>	“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products.” The surface coating activities of Central Maintenance Services are excluded from the requirements of the rule because they are non-commercial operations using coatings supplied by non-refillable aerosol containers.
<b>40 C.F.R. 63 Subpart T</b>	“National Emission Standards for Halogenated Solvent Cleaning.” The solvent used in the parts cleaners is mineral spirits and is not one of the halogenated solvents listed in §63.460(a).
<b>40 C.F.R. 63 Subpart SSSS</b>	“National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil.” There are no operations of Central Maintenance Services defined as a coil coating line subject to Subpart SSSS
<b>40 C.F.R. 60 Subpart EE</b>	“Standards of Performance for Surface Coating of Metal Furniture.” The surface coating activities of Central Maintenance Services are for the purpose of repairing furniture for on-site use and are excluded from the requirements of the rule.
<b>40 C.F.R. 60 Subpart TT</b>	“Standards of Performance for Metal Coil Surface Coating.” There are no operations of Central Maintenance Services defined as a coil coating line subject to Subpart TT.
<b>45CSR§21-12- “Coil Coating” 45CSR§21-16- “Coating of Metal Furniture” 45CSR§21-19- “Coating of Miscellaneous Metal Parts”</b>	The operations of the Central Maintenance Services are outside of the SIC grouping to which these sections of 45CSR21 applies
<b>45CSR§21-37</b>	“Leaks from Synthetic Organic Chemical, Polymer, and Resin Manufacturing Equipment.” There are no processes or streams present in Central Maintenance Services which meet the applicability criteria of 45CSR§21-37 and must implement a Leak Detection and Repair (LDAR) program.
<b>45CSR§21-40</b>	“Other Facilities that Emit volatile Organic Compound (VOC).” None of the emission sources in Central Maintenance Services have maximum theoretical emissions of 6 lb/hour or more.
<b>40 C.F.R. Part 64</b>	The Central Maintenance Services segment of DuPont’s Washington Works does not have any pollutant specific emissions units (PSEU) at this facility that satisfy all of the applicability criteria requirements of 40 CFR § 64.2 (a), i.e., that: 1) have pre-control regulated pollutant potential emissions (PTE) equal to or greater than the “major” threshold limits to be classified as a major source; 2) are subject to an emission limitation or

	standard and; 3) have a control device to achieve compliance with such emission limitation or standard. Therefore, the Central Maintenance Services segment of DuPont's Washington Works is not subject to the Compliance Assurance Monitoring (CAM) rule.
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**Request for Variances or Alternatives**

None

**Insignificant Activities**

Insignificant emission unit(s) and activities are identified in the Title V application.

**Comment Period**

Beginning Date: July 23, 2013

Ending Date: August 22, 2013

All written comments should be addressed to the following individual and office:

Beena Modi

Title V Permit Writer

West Virginia Department of Environmental Protection

Division of Air Quality

601 57<sup>th</sup> Street SE

Charleston, WV 25304

**Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**Point of Contact**

Beena Modi

West Virginia Department of Environmental Protection

Division of Air Quality

601 57<sup>th</sup> Street SE

Charleston, WV 25304

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**Response to Comments (Statement of Basis)**

None